

Kevin R. McCarthy, VSB No. 14273
McCarthy & White, PLLC
8508 Rehoboth Court
Vienna, VA 22182
703-770-9261
krm@mccarthywhite.com
Trustee

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

***** *
In re: *
*
Ali Abbarin, * Case No.: 22-11235-BFK
* (Chapter 7)
Debtor(s) *
***** *

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF
FROM AUTOMATIC STAY

Kevin R. McCarthy, Trustee responds to the Motion For Relief From Automatic Stay
("Motion") filed by U.S. Bank National Association (D.E. 18) as follows:

1. The Motion states that on September 27, 2022, the total amount due under the
Movant's deed of trust on the property located at 8147 Community Drive, Manassas, VA 20109
(the "Property") was \$121,814.81. The Property is owned of record by the Debtor and his wife.

2. The Debtor scheduled the Property with a value of \$280,081.47. Zillow values the
Property at \$296,600.

3. Upon information and belief, the Movant's deed of trust is a first deed of trust on the
Property. As a result, there is ample equity in the Property for the Movant and its interest in the
Property is adequately protected. Under 11 U.S.C. § 362(g)(1), the Movant has the burden of
proof on the issue of the Debtor's equity in the Property.

4. The first meeting of creditors in the case scheduled for October 19, 2022, had to be
adjourned to November 16, 2022, because the Debtor was unable to participate due to phone

troubles. The Trustee intends to obtain information from the Debtor at the adjourned meeting of creditors which may enable him to determine whether it would be in the interests of the estate to sell the Property.

Wherefore, the Trustee requests the Court to deny the Motion.

Respectfully submitted,

/s/ Kevin R. McCarthy
Kevin R. McCarthy, VSB 14273
McCarthy & White, PLLC
8508 Rehoboth Court
Vienna, VA 22182
703-770-9261
krm@mccarthywhite.com
Trustee

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of October, 2022, I served a copy of the foregoing through the court's ecf system on all registered ecf participants who have appeared in this case.

/s/ Kevin R. McCarthy
Kevin R. McCarthy